



**Docket Number: TM-0407**

August 11, 2005

Mr. Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave. SW  
Room 4008-So. Ag Stop 0268  
Washington, DC 20250

Dear Mr. Deal,

I write you to make my formal public comment regarding the 'National List' for organic federal standards, specifically requesting the continuance of sulfites (SO<sub>2</sub>) on the list for the purpose of wine production.

I have advocated for high integrity organic standards for the past 15 years, and support a standard that retains the public's trust in the term "organic" while allowing the trade to grow and expand. My company, Organic Vintners, imports and distributes 69 wines from 11 countries, including the United States. All of the wines I sell are made from certified organic grapes and qualify under the "Made with organic grapes" label.

The current USDA allowance for sulfites in organic wine-making, at less than 100 parts per million, allows for wine quality and shelf-life standards to be maintained. It also enables an international organic wine trade to continue to grow and thrive, as no other organic wine producing country I know of has a specific standard or restriction for SO<sub>2</sub> in organic wine production. (All other countries, except the U.S., assume that sulfites are essential in wine-making).

The USDA standards, which now permit the 'Made with organic grapes' labeling claim, means the wine must contain at least 99.99% certified organic ingredients. This is in keeping with the Boxer Amendment<sup>1</sup> to the 2001 Agriculture Appropriations bill, which amended the Organic Foods Production Act, by making a specific exception to permit SO<sub>2</sub> in organic wine-making. This makes it possible for domestic wineries that choose to add low levels of sulfites—which most U.S. wineries do—to remain competitive and export their organic products. Senator

---

<sup>1</sup> Senator Boxer supported an amendment to the fiscal year 2001 Agriculture Appropriations bill to amend the Organic Foods Production Act to allow sulfites to be used in organic wines. Sulfur dioxide (sulfites) occurs naturally in wine and has a positive effect on a wine's flavor. As a result of this amendment, wine containing sulfites could still be labeled as organic. ([http://boxer.senate.gov/issues/econ\\_ag.cfm](http://boxer.senate.gov/issues/econ_ag.cfm))

Boxer's own web site references that SO<sub>2</sub> "occurs naturally in wine and has a positive effect on the wine's flavor."

I believe that wines made with organic grapes outsell organic wines made with no sulfites added by a margin of ten-to-one in the U.S. and 100-to-one worldwide.

My company and other organic wine companies have experienced healthy growth into food service and retail sectors<sup>2</sup> as our wines are competitive on quality in the glass. Without the addition of low levels of sulfites, our sector of the industry would disappear, leaving only the niche' market of no sulfites added wine. In other words, if SO<sub>2</sub> is removed as an acceptable substance in wine-making, the organic wine trade would be profoundly negatively impacted and there would be no incentive to grow certified organic wine grapes.

The American consumer deserves a full spectrum of quality choices in organic wine, and, as they do now, they will look beyond domestic choices if the only organic wine produced in this country is no sulfite added wine. Any change to the current list on SO<sub>2</sub> will stunt demand for organic wine grapes, and create a disincentive for grape growers to convert to organic practices. Continuance of the current protocol for SO<sub>2</sub> allows the organic wine category to grow, which will translate to greater acreage in certified organic practices.

At its philosophical core, organic still means "grown in harmony with nature." Sulfites occur in nature. They occur naturally,<sup>3</sup> with no manipulation by human hand, in wine. This is why the USDA regulations must continue to embrace an Old World tradition that predates even the invention of pesticides: the addition of small amounts of sulfites to wine in the wine-making process as a means for stabilizing and preserving the overall quality of the wine, including its taste.

I respectfully request, not so much for my company, but for the continued growth of wines made with organic grapes in this country and worldwide, that sulfites remain as an acceptable substance on the National List for federal organic standards.

Sincerely Yours,



Barnet Feinblum  
President/Founder  
Organic Vintners  
1628 Walnut St.  
Boulder, CO 80302  
1-800-216-3898

---

<sup>2</sup> According to *The Natural Foods Merchandiser's* "Market Overview 2004" study, organic beer/wine is a \$66 million category in natural retail, and grew at 23% in 2003.

<sup>3</sup> Frey Vineyards, [www.freywine.com](http://www.freywine.com): "In addition, small amounts of sulfites can be naturally present in wine and other foods, since the abundant element of sulfur takes many forms as a part of all living things."